

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Summit Marine, Inc.
Attn: Kent Berg
844 West Birchwood Street
Morton, Illinois 61550

Application No.: 04100080
Applicant's Designation:
Subject: Coating Operation
Date Issued:

I.D. No.: 179050ABP
Date Received: October 4, 2004
Expiration Date:

Location: 844 West Birchwood, Morton

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Five Coating Booths Controlled by Filters
Diesel-Engine Testing Cells

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

- 1a. This federally enforceable state operating permit is issued to limit the emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., VOM to less than 100 tons/yr, 10 tons/yr of any single HAP, and 25 tons/yr of a combination of any such HAPs), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The facility is not subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subparts A and Mmmm because this source is not a major source, is not located at a major source, or is not part of a major source of emissions of HAP.
- 3a. This permit is issued based on the affected engines not being subject to the requirements of 35 IAC 212.321 or 212.322 as a process weight rate can not be set so that such rules can not reasonably be applied.
- b. The affected engines are not subject to 35 IAC 216.121 or 35 IAC 217.141, because the affected engines are not by definition a fuel combustion unit.

4. Pursuant to 35 IAC 212.123:

- a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.
- b. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 1,000 ft radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

5. Pursuant to 35 IAC 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

6. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm.

7. Pursuant to 35 IAC 215.204(j), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material, delivered to the coating applicator:

<u>Miscellaneous Metal Parts and Products Coating</u>	<u>(Lb/Gal)</u>
Clear Coating	4.3
Air Dried Coating	3.5
Extreme Performance Coating	3.5

8a. Only utilize distillate fuel oil (Grade No. 2) as the fuel source for the engine test cells.

b. Organic liquid byproducts or waste materials shall not be used in the process emission sources without written approval from the Illinois EPA. The use of any other fuel shall require a revised permit.

c. The Illinois EPA shall be allowed to sample all fuels stored at the above location.

9a. The VOM emissions from coating line shall not exceed 3.23 tons/mo and 32.3 tons/yr. The VOM emissions shall be calculated using the following equation:

$$E = [\sum P_i \times C_i] / 2,000$$

Where:

E - VOM emissions (tons)

P_i - Coating and solvent usage (gal)

C_i - VOM content of coating and solvent used (lb/gal)

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any hazardous air pollutants from this source not triggering the requirement of the Section 112(g) of the Clean Air Act.
 - c. This permit is issued based on negligible emissions of particulate matter from the five paint booths. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year each source.
 - d. These limits are based on the maximum production rate. Compliance with annual limits shall be determined from a running total of 12 months of data.
10. Emissions and operation of engine test cells combined shall not exceed the following limits:

Diesel Fuel Usage: 362 gallons/month, 3,622 gallons/year

<u>Pollutant</u>	Emission		
	<u>Factors</u> <u>(Lb/Gal)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO _x)	1.573	0.285	2.85
Carbon Monoxide (CO)	0.869	0.157	1.57
Volatile Organic Material (VOM)	0.052	0.009	0.09
Particulate Matter (PM)	0.087	0.015	0.15
Sulfur Dioxide (SO ₂)	0.041	0.007	0.07

These limits for NO_x, CO, VOM, and PM are based on the maximum fuel usage and memo from United States Environmental Protection Agency titled "Emission Factors for Recreational Marine Diesel Engines, (Reference #EPA420-F-02-044 dated September 9, 2002)".

11. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

12. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts of coatings and solvents used (gallons/month and gallons/year);
 - b. VOM and HAP content of each coating and solvent (lb/gallon);
 - c. Diesel fuel usage (gallons/month and gallons/year); and
 - d. CO, NO_x, PM, SO₂, VOM and HAP emission with supporting calculations (tons/month and tons/year).
13. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
14. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

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If you have any questions on this, please call Mike Dragovich at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission of an affected paper coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario, which results in maximum emissions from such a plant. Limiting usage of VOM and HAP containing materials to levels below major status and basing emissions are equal to the usage of these materials. The resulting maximum emissions are below the levels (e.g., 25 tons per year of combined total HAPs, 10 tons per year of a single HAP, and 100 tons per year of volatile organic material), at which a plant would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this facility will be less than predicted in this summary to the extent that the plant uses less of material, gaseous fuel is used, and control measures are more effective than required by this permit.

EMISSIONS (Tons/Year)

<u>Equipment/Process</u>	<u>PM</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>VOM</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
Coating Line	2.20	---	---	---	32.30	< 10.0	< 25.0
Engine Test Cells	<u>0.15</u>	<u>2.85</u>	<u>1.57</u>	<u>0.07</u>	<u>0.09</u>	_____	_____
Totals:	2.35	2.85	1.57	0.07	32.39	< 10.0	< 25.0

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